

REMARKS

The foregoing amendments and the following remarks are responsive to the Office Action mailed March 25, 2004. Applicant respectfully requests reconsideration of the present application.

Claims 24-56 are pending. Applicants have cancelled claims 24-56, and added new claims 57-84. Therefore, claims 57-84 are presented for examination.

Claims 47-48 and 53-56 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants have cancelled those claims.

In particular, with respect to claim 47-48, the Examiner objected to the terminology that the keyword is user customizable. Support for this limitation may be found, for example, in the parent patent of the present application, incorporated therein by reference, for example in published patent 6,026,410, column 12, lines 5-24.

With respect to claims 53-56, the Examiner inquired as to the meaning of the terminology "message unit" able to "add additional information to the request message." Applicants respectfully submit that this feature of the invention is described in the Specification. For example, at page 11, lines 8-17, where the message unit substitutes an address for a keyword, i.e. adds additional information to the request message as entered by the user. Therefore, Applicants respectfully request withdrawal of the rejections under 35 USC 112, second paragraph.

Examiner rejected claim 24 under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,330,537 issued to Davis, et al. Examiner rejected claims 24-46, and 47-56 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,330,537 issued to Davis, et al. in view of U.S. Patent No. 6,601,026 issued to Appelt et al. Examiner rejected

claims 47-56 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,408,272 issued to White, et al. in view of U.S. Patent No. 6,601,026 issued to Appelt et al.

Applicants first respectfully submit that Davis, Appelt and White are not proper prior art to the present invention. The parent patent, of which this application is a continuation in part, was filed February 10, 1997, and thus predates Davis, Appelt, and White each by more than two years. Therefore, Applicants submit that these references cannot be considered not proper prior art to the present invention. Therefore, the claims are not obvious over a combination of these references.

Secondly, Davis is concerned with automatic filtering of television content. Davis' is a closed system for navigating through menu structure of a program guide. There is no thought or provision for interacting with disparate, external data servers, which is the field of operation of this application. Hence, in Davis, no concept of a connector file to contain information relating to interaction with such disparate resources, one connector file (typically) per external resource. This is a disparate art from the area of the present invention, which is concerned with fulfilling user requests based on keyword. One of skill in the art would not look to Davis. Therefore, Applicants submit that the claims should not be rejected under Davis.

Even assuming that Davis is considered a valid reference, it does not make the claims obvious. Davis discusses a standard parser for voice commands, on the user's television set. Davis does not teach or suggest connecting to a server. Furthermore, Davis does not teach or suggest the use of keywords. Although Davis uses the term "keyword" what Davis means by this term is referring to terms recognized by a speech recognizer (Davis, column 5, lines 4-11). This is fundamentally different from a user entering a keyword indicating a particular action to be taken. In this instance, the user need not know or use

keywords. Rather, Davis analyzes the sentence (natural language) and extracts from it certain terms which are known, which are then tagged. (Davis, column 4, lines 20-31). These tags would correspond to the "keyword" terminology as used in the present application. Thus, in Davis, the user does not use keywords that the user is aware of, and includes in the original request. Therefore, the claims are not obvious over or anticipated by Davis.

Appelt discusses a natural language querying tool. The point of Appelt is that there are no "keywords" that the user must know. Rather, Appelt discusses textual analysis processed based on grammars to generate indices. This is fundamentally distinct from a system that uses keywords, known by the user, to perform complex tasks. Therefore, one of skill in the art would not look to Appelt. Appelt also describes interaction with a single resource, in this case, a form of search engine which pre-indexes a selected set of text sources to allow for natural language queries of those sources. The Appelt system constitutes a data server. The use of keywords in the two systems is different; in the present application, keywords are used simply to select the appropriate one of several connectors for processing an operand; in Appelt, keywords contained within the operand are used for search through the pre-prepared index.

There is no motivation nor any logic in combining the inventions of Davis and Appelt. Davis is concerned with navigating a complex menu tree, while Appelt is concerned with indexing documents to enable natural language queries.

As noted above Davis does not teach or suggest keywords entered by a user, to request a specific action. Rather, the use of natural language parsing teaches away from such known keywords, but providing full flexibility to the user to use any language. Appelt does not teach or suggest such known keywords to invoke connectors either. In fact, Appelt

discusses a user entering a query without any keywords, and the system analyzing the words and phrases to determine the user's meaning. Therefore, the claims are not obvious over Davis in view of Appelt.

White discusses distributed processing of voice inputs. In particular, White discusses processing locally, and if local processing is insufficient transmitting the data to a remote system for further processing.

White, like Appelt and Davis, discusses natural language processing which uses grammars and the like to determine what the user meant to ask. As discussed above, this is different from user-customizable keywords which invoke particular connector files.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all pending claims are in condition for allowance. Such allowance is respectfully requested.

If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to contact Judith A. Szepesi at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

Date:

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